



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

October 22, 2003

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Freudenberg - NOK General Partnership / 145-16661-00028

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

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October 22, 2003

Mr. Rodney W. Wolfe
Freudenberg – NOK General Partnership
487 W. Main Street
Morristown, IN 46161

Re: 145-16661-00028
Significant Permit Modification to
Part 70 Operation Permit No.: T145-7643-00028

Dear Mr. Wolfe:

Freudenberg – NOK General Partnership was issued a Part 70 operating permit (T145-7643-00028) on May 26, 1999. Freudenberg petitioned for review of the Part 70 operating permit on June 24, 1999. This petition was filed in the Office of Environmental Adjudication under Cause Number 99-A-J-2330.

The modification consists of changes to conditions A.1, D.1.1, D.1.2, and D.1.4. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mark Derf, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Mark Derf or extension (3-4227), or dial (317) 233-4227.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
PD/mad

cc: File - Shelby County
U.S. EPA, Region V
Shelby County Health Department
Air Compliance Section Inspector – D. J. Knotts
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner
Office of Legal Counsel – Aaron Schmoll



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PART 70 OPERATING PERMIT SIGNIFICANT PERMIT MODIFICATION OFFICE OF AIR QUALITY

**Freudenberg - NOK General Partnership
487 West Main Street
Morristown, Indiana 46161**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T145-7643-00028	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: May 26, 1999 Expiration Date: May 26, 2004

First Administrative Amendment No.: 145-12973 issued on January 12, 2001
Second Administrative Amendment No.: 145-13948 issued on May 3, 2001
First Reopening No.: 145-13484 issued on March 18, 2002
First Minor Source Modification No.: 145-15859 issued on June 10, 2002
First Minor Permit Modification No.: 145-15586 issued on July 2, 2002

First Significant Permit Modification No.: 145-16661-00028	Pages Modified: 3, 4, 24, 25
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: Expiration Date: May 26, 2004

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.16 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Adhesive Spray Booth

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Particulate Matter (PM) [40 CFR 52 Subpart P]
- D.1.2 Particulate [326 IAC 6-3-2(d)]
- D.1.3 Volatile Organic Compounds (VOC)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.4 Training

Compliance Determination Requirements

- D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.6 Record Keeping Requirements [326 IAC 2-7-6(1),(6)]

D.2 FACILITY OPERATION CONDITIONS - Insignificant Activity Degreaser

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]

Compliance Determination Requirements

- D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

Certification

Emergency/Deviation Occurrence Report

Semi-Annual Compliance Monitoring Report

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operate a stationary rubber product manufacturing process.

Responsible Official: Plant Manager
Source Address: 487 West Main Street, Morristown, Indiana 46161
Mailing Address: P.O. Box 245, Morristown, IN 46161-0245
SIC Code: 3053
County Location: Shelby
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This source consists of the following emission units and pollution control devices:

- (1) Four (4) rotary spray coater facilities, identified as CE01, each facility having a maximum capacity of 1,000 pounds of parts per hour, using no control, and exhausting to stack S1.
- (2) Four (4) Grieve rubber curing ovens, oven # 1 with a maximum capacity of processing 60.0 pounds of rubber per hour, ovens # 2, 3, and 4 each with maximum capacity of 28.5 pounds of rubber per hour, using no control, and exhausting to stacks identified as Grieve 1, 2, 3, and 4, respectively.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (2) One (1) Desma rubber molding press, with a maximum capacity of processing 11.0 pounds of rubber per hour.
- (3) Three (3) REP rubber molding presses, each with a maximum capacity of processing 9.1 pounds of rubber per hour.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) Four (4) rotary spray coater facilities, identified as CE01, each facility having a maximum capacity of 1,000 pounds of parts per hour, using no control, and exhausting to stack S1.
- (2) Four (4) Grieve rubber curing ovens, oven # 1 with a maximum capacity of processing 60.0 pounds of rubber per hour, ovens # 2, 3, and 4 each with maximum capacity of 28.5 pounds of rubber per hour, using no control, and exhausting to stacks identified as Grieve 1, 2, 3, and 4, respectively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to CP 145-3306, ID 145-00028, issued on February 14, 1995 and 40 CFR 52 Subpart P, the particulate matter (PM) from the adhesive coating booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.2 Particulate [326 IAC 6-3-2(d)]

- a) Pursuant to 326 IAC 6-3-2(d), particulate from the adhesive coating booth shall be controlled by dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.
- b) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the adhesive coating booth is in operation.

D.1.3 Volatile Organic Compounds (VOC)

Due to the date of construction, there are no 326 IAC 8 rules applicable to this facility.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 Training Requirements

- (a) The Permittee shall implement an operator-training program.
 - (1) All spray booth operators or employees that perform maintenance at the facilities listed in CE01 shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and

retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

- (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain a copy of the operator-training program, training records, and those additional measures prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Significant Permit Modification to
a Part 70 Operating Permit**

Source Background and Description

Source Name:	Freudenberg - NOK General Partnership
Source Location:	487 West Main Street, Morristown, Indiana 46161
County:	Shelby
SIC Code:	3053
Operation Permit No.:	T145-7643-00028
Operation Permit Issuance Date:	May 29, 1999
Modification Permit No.:	145-16661-00028
Permit Reviewer:	Mark A. Derf

The Office of Air Quality (OAQ) has reviewed petitions for review for Freudenberg - NOK relating to a stationary rubber product manufacturing facility.

History

Freudenberg - NOK was issued a Part 70 operating permit (145-7643-00028) on May 26, 1999. Freudenberg - NOK petitioned for review of the Part 70 operating permit on June 24, 1999. This petition was filed in the Office of Environmental Adjudication under Cause Number 99-A-J-2330. This permit modification shows the changes made to the Part 70 operating permit in order to settle issues raised by the petition for review. A significant permit modification has been drafted due to the fact that changes in the permit include dry filter training, recordkeeping and reporting requirements.

The appeal requests follow with the deleted language in the permit appearing as ~~strikeouts~~, and the new or revised language appearing underlined in the responses. In addition to any changes made to address appealed provisions, the permit has also been updated to change all references for the Office of Air Management (OAM) to the Office of Air Quality (OAQ) and the Table of Contents and page numbering have been changed as needed.

Appeal Item 1: [Part 70 operating permit appeal, Cause No. 99-A-J-2330]

The Petitioner objects to condition A.1 (General Information). The condition states that the responsible official is Dan Klaiber. The responsible official should be Dawn Johnson.

Response 1:

IDEM OAQ has reviewed the requested change to condition A.1 (General Information). Recent changes in model permit language have determined that the job title of the responsible official is more suitable in the general information section as the person filling that position may change. Therefore, Condition A.1 will be revised as follows:

A.1 General Information

The Permittee owns and operates a rubber product manufacturing process in Plant 1, and an automobile parts production in Plant 2.

Responsible Official: ~~Dan Klaiber~~ Plant Manager
Source Address: 487 West Main Street, Morristown, Indiana 46161
Mailing Address: P.O. Box 245, Morristown, IN 46161-0245
SIC Code: 3053
County Location: Shelby
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

Appeal Item 2: [Part 70 operating permit appeal, Cause No. 99-A-J-2330]

The Petitioner objects to Condition D.1.3(a) (Monitoring). The Petitioner states there is no need to conduct daily inspections of filters to verify the place and weekly inspections of the overspray. The Petitioner states the facility complies with applicable PM limit without filters. The Petitioner believes that there is no need for filters or the daily or weekly inspections.

Response 2:

Revisions have been made to Condition D.1.3(a) of the Title V operating permit to address the Petitioner's objection to the Monitoring Requirements. These revisions are made according to the new standards for surface coating facilities and updated in this permit modification. IDEM OAQ has revised the process weight rate rule (326 IAC 6-3-2(d)) in order to determine particulate matter emission limitations. The revised rule language has been incorporated into the permit and the permit has been revised as follows:

D.1.1 Particulate Matter (PM) ~~[326 IAC 6-3-2(c)]~~ [40 CFR 52 Subpart P]

Pursuant to CP 145-3306, ID 145-00028, issued on February 14, 1995 and 40 CFR 52 Subpart P, the particulate matter (PM) from the adhesive coating booth shall ~~be limited by the following: not exceed the pound per hour emission rate established as E in the following formula:~~

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.2 Particulate [326 IAC 6-3-2(d)]

a) Pursuant to 326 IAC 6-3-2(d), particulate from the adhesive coating booth shall be controlled by dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer-s specifications. This requirement to operate the control is not federally enforceable.

b) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the adhesive coating booth is in operation.

D.1.34 ~~Monitoring~~ Training Requirements

~~The spray adhesive coating booth, CE01, has applicable compliance monitoring conditions as specified below:~~

(a) ~~Daily inspections shall be performed to verify the placement, integrity and particle loading~~

~~of the filters. To monitor the performance of the paper filters, weekly observations shall be made of the overspray while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C—Compliance Monitoring Plan—Failure to Take Response Steps, shall be considered a violation of this permit.~~

The Permittee shall implement an operator-training program.

(1) All spray booth operators or employees that perform maintenance at the facilities listed in CE01 shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(3) All operators shall be given refresher training annually.

~~(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other noticeable change in overspray emissions is observed. If no overspray emission is usually observed, evidence of any overspray emission will be considered a noticeable change. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.~~

~~Failure to take response steps in accordance with Section C—Compliance Monitoring Plan—Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(c)~~ Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Appeal Item 3: [Part 70 operating permit appeals, Cause No. 99-A-J-2330]

The Petitioner objects to Condition D.1.3(b) (Monitoring). The Petitioner states the condition purports to require monthly inspections as well as a compliance response plan for “overspray emission”, “evidence of overspray emission “ or “noticeable change in overspray emission” on the roof near the stack. The Petitioner believes that any particulate matter that settles out from the stack will be greater than 100 micrometers in size and not subject to regulation. The Petitioner states the facility is described as operating without controls. Therefore, there is no need to conduct any of the inspection of have a compliance response plan nor is there any legal, public health or environmental basis for requiring a response to “overspray emission”, “evidence of overspray emission” or “noticeable change in overspray emission”.

Response 3:

Condition D.1.3(b) has been revised according to the new standards for surface coating facilities and updated in this permit modification. IDEM OAQ has revised the process weight rate rule (326 IAC 6-3-2(d)) in order to determine particulate matter emission limitations. It should be noted that the revised rule does not differentiate the particulate matter size, it refers to overspray that is visibly detected at the exhaust or accumulates on the ground. Please refer to Response 2.

Appeal Item 4: [Part 70 operating permit appeal, Cause No. 99-A-J-2330]

The Petitioner objects to Condition D.1.3(c) (Monitoring). The Petitioner states the condition purports to require performance of inspections and maintenance. The Petitioner believes there is no need for the dry filters to meet PM limits and no need for a preventative maintenance plan. The Petitioner states condition B.12 does not require inspections or preventative maintenance.

Response 4:

Condition D.1.3(c) has been revised according to the new standards for surface coating facilities and updated in this permit modification. Please refer to Response 2.

Appeal Item 5: [Part 70 operating permit appeal, Cause No. 99-A-J-2330]

The Petitioner objects to Condition D.1.3(a), (b) and (c) (Monitoring Requirements). The Petitioner states Condition D.1.3(a), (b) and (c) was not in the draft permit which the company reviewed and there is no basis for including the condition in the final permit. The Petitioner lists reasons for not including in the final permit as:

- 1) there were no comments on these three issues,
- 2) the process emits PM below the applicable threshold and is not subject to control, and;
- 3) no rational basis for the condition has been identified.

Response 5:

Conditions D.1.3(a), (b), and (c) were included in the technical support document of the draft permit but were omitted from the draft permit itself. Condition D.1.3 is necessary in order to ensure compliance with 326 IAC 6-3 and 326 IAC 2-7. There will be no changes to the condition as a result of this petition.

Existing Approvals

The source was issued a Part 70 Operating Permit T145-7643-00028 on May 26, 1999. The source has since received the following:

- (1) First Administrative Amendment No.: 145-12973 issued on January 12, 2001.
- (2) Second Administrative Amendment No.: 145-13948 issued on May 3, 2001.
- (3) First Reopening No.: 145-13484 issued on March 18, 2002.
- (4) First Minor Source Modification No.: 145-15859 issued on June 10, 2002
- (5) First Minor Permit Modification No.: 145-15586 issued on July 2, 2002

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification as the resolution to the appeals be approved.

Conclusion

This permit modification shall be subject to the conditions of the attached permit 145-16661-00028.